

AN EXAMINATION OF ACTS OF NONCOMPLIANCE IN THE  
TITLE VI PUBLIC SERVICE EMPLOYMENT PROGRAM OF  
RICHMOND COUNTY, GEORGIA

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## INTRODUCTION

One of the major problems confronting most federally funded programs is a lack of conformity with federal regulations which govern those activities and services provided by the federal government. This lack of conformity is referred to as acts of noncompliance.<sup>1</sup>

Several acts of noncompliance with federal regulations are addressed in the course of this study as they relate to the Title VI Public Service Employment Program in Richmond County, Georgia operated under the auspices of the Comprehensive Employment and Training Act (CETA). Title VI is only one of many federally funded programs that provide on-the-job training and employment for economically disadvantaged persons. CETA is largely a decentralized system in which units of local and state governments apply to become program operators for such programs as Title VI. These units of government are known as Prime Sponsors. Federal grants are awarded to those units of government whose Comprehensive Employment Plans to operate programs under CETA are approved by the federal government. Prime sponsors are required to employ businesses/institutions to operate

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<sup>1</sup>Florence Casey, "Public Service Employment Programs," Perspective on Public Job Creation. (St. Paul, Minnesota: West Publishing Company, 1977), pp. 15-30.

these federal programs and to carry out their intent. These businesses/institutions are known as subcontracting agencies or subrecipients.<sup>2</sup>

Measuring the productivity and efficiency of the Title VI Program is dependent upon accurate record keeping, maintaining an effective system of communication between management and subrecipients and making sure that services are being rendered to individuals participating in the program (these individuals are commonly referred to as participants).

Subrecipients are required to submit reports periodically on both the fiscal and programmatic aspects of the federal grant. Program reports, like financial reports, provide accountability for the effectiveness of the program by indicating to what extent subrecipients are accomplishing their objectives. Program reporting places great reliance on the subrecipient to manage the day-to-day operation of activities. As a consequence, prime sponsors are required to monitor constantly the performance of those activities and functions to assure that time schedules are met, that proposed work units are accomplished, and that other performance goals are achieved.<sup>3</sup>

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<sup>2</sup>Ibid., pp. 39.

<sup>3</sup>"Governing The CETA Program," U.S. Congressional and Administrative News, Series P-90 No. 10, March 4, 1978 (Washington, D.C.: Government Printing Office, 1978), p. 19.



In order to assure compliance with state laws and federal regulations, and to establish effective management procedures sufficient to prevent acts of non-compliance, the Independent Monitoring Unit was created by the Office of the Inspector General. The objectives of this Unit are: (1) to systematically review and determine whether subrecipients operating programs and activities are legally, fiscally, administratively and programmatically appropriate, efficient and in compliance with the terms of the federal regulations and (2) to monitor and measure the prime sponsor's quantitative and qualitative progress in carrying out the objectives and intentions of the Comprehensive Employment and Training Act.<sup>4</sup>

The purpose of this study is to examine the various acts of noncompliance with federal regulations in the Title VI Public Service Employment Program of Richmond County, Georgia and their impacts on the agency.

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<sup>4</sup>Ibid., pp. 1911.

## THE PROBLEM AND ITS SETTING

The Richmond County Comprehensive Employment and Training Agency evolved from a merger in 1975 of the Richmond County Economic Development Agency and the Manpower and Training Program. The Agency is composed of thirty three members as follows: the Planning Council (13 members, all appointed by the Administrator of the Agency), the Administrator, the Deputy Administrator, Equal Employment Officer, Affirmative Action Officer, Private Industry Council Director, Program Planning Director (staff of three assistants), Fiscal Management Director (staff of two assistants), Office Secretary, Receptionist (who also acts as the Agency's information specialist), and the Independent Monitoring Unit (staff of two contract specialists and four program monitors).

The Independent Monitoring Unit is a unique unit within the Prime Sponsor's staff. It is assigned the following responsibilities:

- (1) Review all systems for controlling program administration, particularly systems for determining participant eligibility;
- (2) Review pay records and attendance reports to assure that controls are established for preventing unauthorized payments;
- (3) Interview participants to determine job related problems;

- (4) Review plans and procedures and sub-recipient's capability to carry out programs and activities, (a subrecipient is a business or an institution that submits a comprehensive employment plan to the Prime Sponsor to be funded by the Federal Government);
- (5) Examine worksites and work conditions;
- (6) Monitor subrecipients' maintenance of records on all expenditures of CETA funds;
- (7) Review Affirmative Action plans;
- (8) Make recommendations to Prime Sponsors for corrective action whenever the review identifies noncompliance with the Comprehensive Employment and Training Act (CETA) and the Federal Regulations;
- (9) Document monitoring findings; and
- (10) Maintain on file a copy of each monitoring report and the Prime Sponsor's reply to each report.<sup>5</sup>

During the period of October 1, 1978 to May 30, 1980 the writer worked with the Richmond County, Georgia Comprehensive Employment and Training Agency in the capacity of program monitor. The job description of the writer included but was not limited to the following focal responsibilities:

- (1) Being able to assess the extent to which program components were achieving performance goals established in the approved plan;
- (2) Desk top monitoring of a variety of reports generated in response to mandated federal reporting requirements, as well as those required by the local Prime Sponsor;

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<sup>5</sup>Central Savannah River Area Employment and Training Consortium, Standard Operational Procedures Manual, (Augusta, Georgia: 1973) p. 5.

- (3) Conducting on-site monitoring visits utilizing samplings of subrecipients slots to include monitoring of the following areas:
  - o Affirmative Action Plans
  - o Personnel Policies
  - o Recruitment Process
  - o Selection Process
- (4) Developing monitoring reports on each work site visited;
- (5) Conducting follow-up visits when recommended by the Prime Sponsor; and
- (6) Attending training seminars.<sup>6</sup>

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<sup>6</sup>Central Savannah River Area Employment and Training Consortium, Independent Program Monitor's Job Description Leaflet, (Augusta, Georgia: 1973), p. 12.

## STATEMENT OF THE PROBLEM

The problems to be examined are the acts of noncompliance with federal regulations encountered in monitoring programs through on-site observations and interviews with supervisors and participants in the Title VI Public Service Employment Program of Richmond County, Georgia during the period that the writer worked with the Agency.

During the monitoring process, the writer was required to make on-site visits and to hold interviews with supervisors and participants to determine if program operations and activities were in compliance with federal regulations. Several problems observed during those on-site visits, were:

- (1) Inefficient system of communication between management sources;
- (2) Inappropriate management of agency records;  
and
- (3) The inability to adequately address certain employee needs.

These acts of noncompliance are those addressed in this study. In the main, these problems were the direct result of the lack of the existence of efficient managerial skills within the agency.

## METHODOLOGY

The primary techniques that were utilized in the collection of data for this paper were:

- (1) Field observations (on-site); and
- (2) Face to face interviews.

Field observation differs from other modes of observation in that, it is not only a data collecting activity, it can also be a theory generating activity as well.<sup>7</sup> By going directly to work locations of participants and observing working conditions, attitudes of workers, safety conditions, and the general working environment, the writer developed a deeper and fuller understanding of the workers surroundings. Additionally, the writer was able to recognize those negative attitudes and behaviors that normally escaped other observers using different data collecting methods. Field observations are especially appropriate to the study of those behaviors and attitudes that can be understood better within their natural setting. This method of observation was especially, though not exclusively, appropriate to the gathering of very reliable data.

Another primary technique utilized in the collection of data by the writer was that of face to face interviews.

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<sup>7</sup>Earl R. Babbie, "Research Methods and Analysis," The Practice of Social Research. (Belmont, Minnesota: Wadsworth Publishing Company, 1979), p. 205.

To gather on hand information, a questionnaire (See Appendix A) was designed to determine if subcontracting agencies were in compliance and or noncompliance with State and Federal Regulations. Questionnaires are used in connection with many modes of observations in social research which are very essential for the acquisition of reliable date.<sup>8</sup>

Rather than require participants to read questions and enter their own answers, the writer asked questions orally and recorded the participants' responses. The writer was responsible for choosing a random sample of participants from a total of twenty-nine workers and interviewing them. The writer decided that ten participants employed by the Richmond County Comprehensive Employment and Training Agency under Title VI were most sufficient. There were a number of advantages in having such a sample group and in having the questionnaire (See Appendix A) administered by the writer. First, by having such a small sample group, the writer attained a much higher response rate from all participants. Secondly, within the context of the questionnaire, the writer's presence significantly decreased the number of do not know and no answers. Also, the writer provided a guard against confusing questionnaire items. If the participants or respondents misunderstood the intent of a question, the writer clarified matters thereby obtaining clearer responses.

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<sup>8</sup>Ibid., p. 209.

The secondary data collection techniques utilized by the writer in this study were the review of the agency's documents, and past monitoring reports pertinent to the agency. Past monitoring reports served the purpose of supplying background information on the agency and its employment practices, as well as providing information on the type of monitoring activities that had already taken place at that particular agency.



## THEORETICAL FRAME OF REFERENCE

Communication channels are an essential avenue through which information can be transmitted and received by organizations and other outside management sources. It must possess two very important elements. First, the sender or transmitter of the information must know the purpose and nature for transmitting the data. This is particularly important because the information must be encoded into a form that is understandable to the receiver. This is accomplished through the use of such symbols as: words, graphics, diagrams or writings. Additionally, the sender has to transmit the data verbally, either in person, over the telephone, or through formal or informal communication channels.

Formal communication channels are ones in which organizations develop structural relationships, (as expressed through an organizational chart). This organizational structure conveys to the workers who they should communicate with in order to gain needed information. In large agencies or organizations, this formal communication system is carefully defined. Lists of individuals who should receive data and the order in which they are to receive it are developed. On the other hand, informal communication channels which are usually called the grapevine, exist at the same time as the formal channels. The formal communication channel in one respect moves directly down and up the chain of command on the

organizational chart, while the informal communication channel moves in several different directions. Although the grapevine is considered to be ubiquitous, speedy and accurate to a large point, many managers think of it as a good communication channel.<sup>9</sup>

The second important element is an efficient communication system. It is measured in the ability of the receiver of the information to be able to decode the data into easily interpreted language. Efficient communication channels are of the utmost importance to any organization for the following reasons:

- (1) because managers spend a large portion of their time in communication with inhouse and outside management sources;
- (2) because an effective and efficient system of communication is needed to make management more effective in its functions and duties; and
- (3) because an efficient communication system leads to an effective overall organization.<sup>10</sup>

According to Herbert Simon in his book, Communication Patterns In Organizations, "oral communication is the most frequently used form of communication." Oral communication can be of two types: face to face and by telephone. Face

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<sup>9</sup>William F. Glueck, "Effective Communication," Management (Hinsdale, Illinois: Dryden Press, 1977) p. 239.

<sup>10</sup>Ibid., p. 246.

to face communication can involve more non-verbal communication methods than telephone communication. This is why many people, according to Herbert Simon, find the telephone a less desirable method in verbal communication. The transmitter has to be especially careful in his choice of words and tone of voice to get information across. Additionally, sometimes environmental barriers have a diverse effect upon how information is received and recorded. For instance;

- (1) interruptions caused by other people or noises;
- (2) problems with communication channels (telephone lines becoming tied up during peak periods);
- (3) time pressure in which there isn't enough time to communicate as thoroughly as one would need to; or
- (4) so many distractions can occur that the receiver records the wrong information.<sup>11</sup>

Although environmental barriers have a diverse effect on how data are received and retransmitted, it is extremely vital that the receiver be a good and an attentive listener. Here again, an effective and efficient communication network is dependent upon the receiver to exercise his ability in being an attentive listener. Some difficulties that prevent

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<sup>11</sup>Herbert R. Simon, Communication Patterns In Organizations (New York: McGraw Hill, Inc., 1979), p. 305.

a receiver from developing good listening habits are:

- (1) low attention span;
- (2) inefficient recording of information because of low attention span;
- (3) allowing environmental noises to affect the ability to concentrate properly; and
- (4) generally bad listening techniques.<sup>12</sup>

Although these are considered to be the causes of poor listening habits, Herbert Simon suggests that the following are guidelines for effective listening habits:

- (1) stop talking while information is being transmitted;
- (2) establish a good rapport with the transmitter;
- (3) block out distractions;
- (4) allow enough time for discussion of data; and
- (5) when unsure of transmitted data, restate what is misunderstood in the form of a question.<sup>13</sup>

In addition to an effective communication system, the need for an efficient records management system cannot be overemphasized for any organization.

Rapidly increasing operating costs necessitate the need for the efficient management of records. Since the smooth functioning of an organization is greatly dependent upon the efficient utilization of information, records

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<sup>12</sup>Ibid., p. 249.

<sup>13</sup>Ibid., p. 251.

management is rapidly becoming a crucial strategic area in many organizations. Considerable inefficiency and poor utilization of resources result when little or no control is exerted over the creation, utilization, and storage of records. Records refer to the informational documents utilized by an organization to carry out its various functions. Types of records commonly utilized include forms, letters, memorandums, reports and manuals. Records management refers to the activities designed to control the life cycle of a record from its creation to its ultimate disposition. Therefore, a distinction is made between filing, which is one of the more familiar activities in the records management program, and records management.<sup>14</sup>

One of the first priorities in developing a records management program is to clearly identify the objective of the program. The following objectives are characteristic of many records management programs:

- (1) To provide control over the records cycle, (i.e., the creation, utilization, storage, retrieval, and disposition of records);
- (2) To develop efficient procedures for each stage of the cycle;
- (3) To eliminate needless storage of duplicate records;
- (4) To reduce costs in each stage of the records cycle;

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<sup>14</sup>Zane K. Quible. "Records Management" Administrative Office Management (Cambridge, Massachusetts: Winthrop Publishers Inc., 1977), p. 432.

- (5) To develop realistic standards for employee performance and program evaluation;
- (6) To develop throughout the organization an awareness of and an appreciation for the value of a records management program; and
- (7) To standardize procedures and equipment.<sup>15</sup>

Once the objectives of the records management program have been developed, general operating policies of the program should be adopted. The policies are frequently used to guide decision makers about various aspects of the program. The policies should be clearly worded, since vague or ambiguous policies often result in ineffective or improper actions. The following are examples of the kinds of policies frequently included in records management programs:

- (1) The records management program has the support of the management of the organization and is considered to be an integral organizational function;
- (2) Each record created in the organization comes under the jurisdiction of the records management program, and therefore, is subject to centralized control;
- (3) The records management program shall operate under the procedures outlined in the records management manual;
- (4) Records must receive adequate protection at all times;

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<sup>15</sup>Ibid., p. 433.

- (5) The administrative office manager has the primary responsibility for the records management program, but ultimate responsibility lies with the vice president for internal affairs; and
- (6) In terms of work flow, efficiency will have precedence over cost.<sup>16</sup>

The type of control and the location of the records storage system determine the organization of the records management program. Some records management programs operate under centralized control, while others operate under decentralized control. The storage of records may be centralized throughout the organization, or they may be stored decentrally within the various work units. When the control of a records management program is centralized, overall authority and responsibility for the program is vested in one individual. Centralized control results in a formally organized records management program, and two alternatives for storing records are available in both centralized storage and decentralized storage.

Centralized storage, which means that the records are stored in a central location within the organization, results in the following advantages:

- (1) The storage of duplicate records is eliminated;
- (2) Equipment is more efficiently utilized and, thus, fewer file cabinets are required;

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<sup>16</sup>Ibid., p. 434.

- (3) The organization can take advantage of the cost savings that result from standardized equipment and procedures;
- (4) The program utilizes trained employees, which result in greater accuracy in filing records;
- (5) Greater control is exerted over retrieval, retention, and transfer of records;
- (6) Centralized storage helps to assure that all records pertaining to a particular subject are stored in one place;
- (7) Since the program operates continuously, it is not hampered by the absence of employees; and
- (8) Obscure records are more quickly obtained, since their whereabouts are known.<sup>17</sup>

Among the disadvantages of centralized storage are:

- (1) Records may become more vulnerable since they are stored in one central location;
- (2) Considerable time is spent transporting frequently used records to and from the central storage area;
- (3) If records cannot be immediately obtained, inconvenience is likely to result; and
- (4) The confidentiality of records may be more difficult to maintain (more and more organizations are storing confidential records decentrally).<sup>18</sup>

Decentralized storage means that records are kept within the various work units until time for destruction or transfer to low-cost storage areas. The following are advantages of decentralized storage:

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<sup>17</sup>Ibid., p. 435.

<sup>18</sup>Ibid., p. 436.



- (1) confidential records are stored in work units throughout the organization and therefore are less vulnerable;
- (2) since the records are stored on site, valuable time is not spent in transporting records; and
- (3) since each work unit is primarily responsible for the storage of its own records, flexible procedures can be developed.<sup>19</sup>

The following outlines the disadvantages of decentralized storage:

- (1) some work units are likely to develop their own procedures rather than using those of the system;
- (2) duplicate filing equipment may be required; and
- (3) filing equipment may not be efficiently utilized.<sup>20</sup>

Several factors should be considered when deciding whether to store records centrally or decentrally. Among the more important factors are:

- (1) attitudes of top management toward the storage of records;
- (2) competence of personnel;
- (3) size and type of the organization;
- (4) philosophy of the organization with regard to centralization and decentralization; and
- (5) the number and kinds of records stored.

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<sup>19</sup>Thomas C. Beckwith, Information Systems, (Los Angeles, California: Winthrop Publishers Inc., 1979), p.227

<sup>20</sup>Ibid., p. 79.

With decentralized control, each work unit assumes responsibility for the management of its own records. Decentralized control results in duplication of equipment, records, and personnel effort, as well as in a lack of consistency in methods and procedures. In most cases when control is decentralized so is the storage of records, too.<sup>21</sup>

Another component of the records management program is the filing system, which involves systematically classifying, coding, arranging and placing records in storage so that they can be quickly and easily retrieved when needed. Most organizations use standardized filing rules approved by the American Records Management Association. Cross-referencing of materials is also frequently involved in the filing process.

Two general filing methods exist-alphabetic and non-alphabetic. The alphabetic method consist of three specialized indexing systems; (1) filing by name, (2) subject, or (3) geographical area, while the nonalphabetic method is comprised of numerical and chronological indexing system. Many organizations use a combination of two or more indexing systems. Most organizations use one of the alphabetic indexing system. Each of the three alphabetic indexing system utilizes alphabetic sections (A,B,C,D,etc.), and the filing determine the alphabetic sections under which records

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<sup>21</sup>Ibid., p. 81.

are filed. Each system also utilizes two types of folders, individual and miscellaneous - for each alphabetic section. When a specified number of records are filed under a particular category, a separate individual folder is then prepared. For example, when the specified number of records pertaining to "adjustments" are filed, a file folder labeled Adjustment is prepared. Until the specified number of records are filed, records are placed in the appropriate, miscellaneous folder. Using the above example, until the specified number of records pertaining to Adjustment are filed, records pertaining to this subject are filed in the A miscellaneous folder, along with other records of insufficient quantity to warrant an individual folder. Records within each miscellaneous folder are filed alphabetically, with the most recent records for each category filed at the front of the category. Both of the numeric systems utilize a number system in the filing of records. Numeric systems are used extensively for filing records serially and for records on which the date is an important information item.<sup>22</sup>

The Human Relations approach to organizations has accentuated the importance of the satisfaction of employees

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<sup>22</sup>Bernard Bass and L.D. Eldridge, "Accelerated Managers Objectives," Industrial Relations (New York: McGraw Hill, 1974) pp. 65-74.

needs to the survival and effectiveness of the organization. According to behavioral theorists, if management could only learn to satisfy the needs of the worker through the informal organization, both the organization's quest for rationality and increased productivity and the human search for happiness could be attained. The degree to which managers feel responsible for helping employees satisfy their needs is greatly determined by the employees. This is especially true with regards to satisfying the higher-level needs of the employees.

Some managers and/supervisors view employees simply as human machines whose sole function is to produce. The relationship between the supervisor and the subordinate is based on units of input and output. About the only human need that such managers or supervisors are concerned with is helping their employees satisfy their need to be productive. Other managers or supervisors utilize a paternalistic approach. Such supervisors feel that they know what is best for the employees in terms of what programs, benefits and so forth to provide. In such instance, employees have very little control over their welfare. The result is that several of their needs cannot be satisfied.<sup>23</sup>

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<sup>23</sup>Bob Mauser, The Motivation of Employees. (Glenview, Ill.; Appleton Press, 1977), pp. 230-340.

The humanistic approach is considered by most managers and supervisors to be the most appropriate way in which to view subordinates. With this approach, not only do managers and supervisors recognize that employees have certain needs that they can help employees satisfy, but they also recognize that employees have certain needs that only the employees can satisfy. This approach recognizes individual differences among employees. Managers and subordinates work as a cooperative team in the satisfaction of employee needs. Therefore, motivational programs using the humanistic approach are generally more effective than when one of the other approaches is utilized. More and more organizations are increasingly concerned about the job satisfaction of employees. The extent of this concern is reflected by the number of organizations making formal studies of the job satisfaction of employees. These studies are made by having employees complete questionnaires. While many organizations develop their own questionnaires, others utilize questionnaires developed and standardized by outside organizations. The questionnaires designed to assess job satisfaction of employees frequently contain items concerned with:

- (1) The content of the job.
- (2) The nature of supervision.
- (3) The nature of opportunities for advancement.

- (4) The amount of pay.
- (5) The nature of fringe benefits,  
and
- (6) The suitability of working conditions.<sup>24</sup>

One of the most famous studies on job satisfaction of employees was conducted by Fredrick Herzberg, and involved interviewing 200 employees in nine different companies in different geographical locations. The outgrowth of this study is the motivation-hygiene theory developed by Herzberg. The interviews with the employees were designed to determine what satisfied and what dissatisfied employees with regard to their jobs. The respondents were asked to identify those critical incidents causing them to feel exceptionally good about their jobs and those causing them to feel exceptionally bad about their jobs. The researchers also probed into the reasons employees had these feelings.

The research conducted by Herzberg and his colleagues found that employees' job experiences that produced positive attitudes were associated with the content of the job. On the other hand, the job experiences producing negative attitudes were associated with the environment in which the employees performed their jobs. They also found that the experiences leading to positive attitudes were related to the psychological needs of employees but that experiences

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<sup>24</sup>Ibid., pp. 51-57.

leading to negative attitudes were related to the basic needs of employees. Herzberg labeled those experiences leading to positive attitudes as job satisfiers or motivators. The experiences leading to negative attitudes are labeled as job dissatisfiers or hygiene factors.<sup>25</sup>

The factors responsible for producing positive attitudes or job satisfaction include the following:

- (1) Achievement: the opportunity that task completion for seeing the results of effort, and for solving problems independently;
- (2) Recognition: positive acknowledgement of completion of a task or for individual achievement;
- (3) Work: content of the job in terms of its task;
- (4) Responsibility: being responsible and accountable for task completion, for individual performance, and for having sufficient control to decide how and when tasks are to be completed;
- (5) Advancement: advancement or promotion to a higher-level job or position;
- (6) Pay: Inasmuch as pay enables one to satisfy physiological needs, it is an important factor to employees;
- (7) Clear job classification: This is often a statement of the knowledge and skills required to perform a job; and
- (8) Suitable working conditions: the environment of the place of work and the adequacy of equipment and supplies.<sup>26</sup>

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<sup>25</sup>Frederick B. Herzberg, The Motivation to Work (Cambridge, Massachusetts: John Wiley & Sons, 1979), pp. 90-95.

<sup>26</sup>Ibid., p. 186-190.

## ANALYSIS OF THE DATA

The first act of noncompliance identified in this study is that of an inefficient system of communication between management sources.

Currently a formally structured communication system is being used in the agency. This system is similar to that utilized by many organizations, agencies, and firms. The Richmond County Comprehensive Employment and Training Agency has utilized this communication network since its establishment in 1975. Four individuals (one supervisor from the subcontracting agency, two information specialists at the Georgia Department of Labor and one information specialist at the Richmond County Comprehensive Employment and Training Agency) interact with each other by telephone in the transmission of subcontracting agencies' employment data. This is the only method presently being utilized in which incoming information from subcontracting agencies is transmitted to management (The Richmond County Comprehensive Employment and Training Agency and the Georgia Department of Labor). When any employment changes occur, it is the responsibility of the supervisor of that contracting agency to inform the appropriate sources of those changes. This information is transmitted by telephone to one of the information specialists at the Georgia Department of Labor's office. The information is to be recorded and retransmitted



to the information specialist at the Richmond County Comprehensive Employment and Training Agency, where it is recorded in the agency's monthly report for the purpose of determining the effectiveness and productivity of subcontracting agencies programs. Information specialists at the Georgia Department of Labor and the Richmond County Comprehensive Employment and Training Agency have the responsibility of receiving, recording and transmitting by telephone, employment data coming in from over two hundred and fifty subcontracting agencies.

The writer in the execution of his duties as a program monitor for the Richmond County Comprehensive Employment and Training Agency had the responsibilities of monitoring and reviewing employment records for the Opportunity Industrialization Center (O.I.C). During a review of such employment records, the writer discovered some discrepancies between the records maintained at the Opportunity Industrialization Center and the Richmond County Comprehensive Employment and Training Agency. The O.I.C. records stated that it employed two CETA workers at the time. On the other hand, the Richmond County Comprehensive Employment and Training Agency's employment data sheet for the Opportunity Industrialization Center indicated that three CETA workers were then employed at the Center. The Opportunity Industrialization Center's employment data sheet revealed that two

CETA workers were employed with one termination occurring February 26, 1979. In the course of an interview with Mrs. Gloria Butler, Executive Director of O.I.C., in order to reconcile the differences in the two records, Mrs. Butler informed the writer that she had already reported the termination (stating the day and time that it occurred) to Mrs. Sandie Green, information specialist at the Richmond County Comprehensive Employment and Training Agency by the telephone.<sup>27</sup>

Following up on this information, the writer also interviewed Mrs. Sandie Green at the Richmond County Comprehensive Employment and Training Agency. Surprisingly, Mrs. Green revealed to the writer that she could not recall such a phone call from Mrs. Butler regarding the termination. However, she maintained that it was quite possible that Mrs. Butler did report the termination, but due to her hectic work schedule, she might have forgotten to record the information on the Center's employment data sheet. In addition, Mrs. Green also informed the writer that presently there is no mechanism in place to double check employment information that comes in from the two hundred and fifty CETA subcontracting agencies.<sup>28</sup>

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<sup>27</sup> Interview with Mrs. Gloria Butler, Augusta, Georgia, March 27, 1979.

<sup>28</sup> Interview with Mrs. Sandie Green, Augusta, Georgia, March 27, 1979.

Through further observations of the information specialists at both the Richmond County Comprehensive Employment and Training Agency and the Georgia Department of Labor's Office, the writer discovered that the formal communication system presently being used as the only means of receiving employment changes from subcontracting agencies is inadequate to handle the numerous telephone calls that come in during certain peak periods (for instance, during the fifteenth and thirtieth of each month when deadlines for filing reports are to be met). Both the Richmond County Comprehensive Employment and Training Agency and the Georgia Department of Labor use a five line telephone system. During these peak periods, the telephone lines became tied up, preventing a number of subcontracting agency supervisors from getting their calls through in order to relay employment data to the information specialists. On many occasions, the information specialists in their haste to receive the many incoming calls, have experienced the following errors:

- (1) recorded the wrong information on the incorrect data sheet for the wrong county.
- (2) been interrupted and distracted by other people working in the same general office area.
- (3) during certain peak periods did not have enough time to communicate thoroughly with subcontracting agency supervisors.
- (4) written down inaccurately employment slot levels or terminations; and

- (5) transmitted misunderstood and inaccurate data that they hastily recorded.<sup>29</sup>

Such a state of affairs caused a lot of confusion and made it practically impossible for accurate data to be kept on the program. To compound this chaotic situation, the writer discovered that written reports on employment changes are not required to be submitted to the information specialists at either the Georgia Department of Labor's Office or the Richmond County Comprehensive Employment and Training Agency as a means of double checking transmitted data. Based upon these observations of the communication system presently being used, it is quite evident that it is an unreliable and inefficient method for the acquisition and transmission of reliable data.

Whenever errors in transmission were discovered, it became a time consuming process of tracing the inaccurate data back to the source. Because of the overwhelming volume of information that is generated by the numerous subcontracting agencies that the information specialists deal with, tracing inaccurate information back to the source very seldom occurred. This problem has impacted negatively on the Richmond County Comprehensive Employment and Training Agency and has contributed toward the following:

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<sup>29</sup>Observation study conducted by the writer, Augusta, Georgia: March 27, 1979.

(1) The creation of a freeze on employment positions.

This occurs when (a) subcontracting agencies fail to inform proper management sources of changes in employment levels and terminations, (b) when information is recorded incorrectly by information specialists at either the Georgia Department of Labor or the Richmond County Comprehensive Employment and Training Agency and or, (c) when misunderstood or incorrect data are transmitted. Whenever, these things occur the employment position(s) that is vacant remains as such creating a freeze on that position(s) because management sources are unaware of unfilled positions;

(2) A loss of funds for the next fiscal year. Whenever, an employment position(s) remains unfilled in a subcontracting agency's program for an indefinite period of time, funds for that position remain unused. Therefore, when this is discovered, the director at the Richmond County CETA Agency along with the fiscal planning committee, decides whether to reduce that agency's grant, or discontinue it all together; and

(3) Inadequate control of enrollment of participants at various work sites. Here again participants enrollment in the various agencies is dependent upon two distinct variables (a) the promptness of subcontracting agencies to inform management sources of all terminations as they occur; and (b) the accuracy in receiving, recording and transmitting

data to the proper management sources. It is quite obvious that if the proper management sources are not informed of terminations, available vacancies cannot be filled. This causes a decrease in the number of participants to be hired and an increase in the number of people (unknowingly) who are terminated.<sup>30</sup>

The second act of noncompliance addressed is that of the inappropriate management of agency records.

Through on-site observations and reviewing of the Agency's programmatic and employment documents, the writer uncovered the inappropriate management of agency records. Currently, the agency utilizes a centralized storage method for maintaining all agency records. This particular method is utilized by many organizations, businesses, and agencies. The centralized storage methods has been utilized by the agency since it was established in 1975. All records are maintained and stored in one central location. The writer discovered that:

(1) the agency's records management system did not provide control over the records cycle. For instance, it did not provide control over the creation, utilization,

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<sup>30</sup> Determined from past subcontracting agencies noncompliance reports compiled by the Independent Monitoring Unit, Augusta, Georgia, 1978.

storage or retrieval of agency records. The writer also discovered that all information concerning the agency and subcontracting agencies are maintained in only two filing cabinets located in the agency's duplicating room. This room is located on the second floor, while the offices are located on the first. This causes a lot of inconvenience to everyone.

In an interview with Mrs. Sandie Green, information specialist, who is also in charge of the management of the agency's records system, the writer was informed of the many advantages as well as disadvantages of this particular records system. According to Mrs. Green, the advantages are:

- (1) filing equipment can be more efficiently utilized because fewer filing cabinets are needed. This additionally cuts the cost for office equipment.

- (2) greater control can be exerted over the retrieval, retention and transfer of agency documents, files and records; and

- (3) this centralized storage method aids in maintaining all agency documents in one central location.

Among the disadvantages of using this records management system Mrs. Green highlighted the following:

(1) all agency records, files and documents are vulnerable to the violation of confidentiality because all records are stored in one central location and are readily accessible to designated employees; and

(2) records and documents can not be immediately retrieved, which becomes an inconvenience to those that need such information in a hurry.<sup>31</sup>

Mrs. Green additionally expressed to the writer that it is extremely difficult to maintain the confidentiality of agency records because anyone who requests to see records of their department may just simply request to view the records, and while in the records room may decide to view confidential records of the Agency, fellow employees, or other departments. According to Mrs. Green, it is extremely difficult to prove that such an individual has violated the agency's procedure, as such, the confidentiality of important records and documents is very hard to maintain. Mrs. Green also maintained that due to her numerous functions such as receiving, recording, and transmitting employment information from over two hundred and fifty CETA agencies, it is difficult for her to execute the duties of maintaining an efficient records management system and recording employment information. This means that when

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<sup>31</sup>Interview with Mrs. Sandie Green, Augusta, Georgia, March 28, 1979.



she is away from her desk, phone calls from subcontracting agencies to furnish her with the relevant employment data are usually not answered. Moreover, the lack of close proximity to these files at all times creates a favorable condition for even authorized personnel to gain access to these files. Above all, there is no established policy for the retrieval of records from these files.

Quible suggests a step-by-step outline for retrieving records in a central storage area as follows:

- (1) the individual making the request fills out a request slip which is transported to the central storage facility;
- (2) the requisition clerk approves the request and asks the file clerk to retrieve the record;
- (3) the record is transported either by messenger or by a mechanical device to the individual making the request; and
- (4) the record is returned to the central storage area when no longer needed by the individual making the request.<sup>32</sup>

Although Mrs. Green realizes the importance of such a policy, she maintains that she simply did not have the time to establish such a policy.

Secondly, in reviewing the agency's records, the writer found that several of the records on some programs were

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<sup>32</sup>Zane Quible. "The Process of Records Management." Introduction to Administrative Office Management (New York: Winthrop Publishers, 1979), p. 452.

incomplete. For instance the writer discovered that some of the records did not elaborate on problems, delays, nor did they specify the nature of irregularities that the subcontracting agency encountered. This is to say that these records did not elaborate on the overall progress of the agency including results of the agency programs, nor did they elaborate on the problems that the agency incurred such as terminations, or work assignments not being carried out, nor did the reports give an indication on any actions that the agency took in addressing such problems. Additionally, their records failed to show whether or not the agency's fiscal, employment and performance reports were coordinated enough for consistency. Moreover, the records in the agency were not well kept to enable one to compare them with those of subcontracting agencies' records.

Thirdly, the writer discovered that several programmatic records were not systemically classified, coded or arranged in a manner that they could be easily distinguished from each other. For instance, the financial records were filed in the same folders as the programmatic records. This made it extremely difficult to retrieve financial information on a particular department because that information was not kept in a separate folder. In addition, certain programmatic files on the day to day operations of the various

subcontracting agencies such as: planned work schedules for participants, sign in/out sheets, work locations or programmatic changes were not filed in separate folders for the specific agencies. This complicated matters during periods when evaluation on a particular agency was to be undertaken. Many hours were wasted in going through files for information relevant to that particular agency.

The inability of the agency to develop an effective records management system has several negative effects on the Richmond County Comprehensive Employment and Training Agency, such as:

- (1) the agency's operations became less efficient in its utilization of resources when little or no control is exerted over the creation, storage and utilization of records;
- (2) agency's records became more vulnerable to all employees since they are stored in a remote central location of the building;
- (3) considerable time is spent transporting frequently used records to and from the central storage area;
- (4) the information specialist became less efficient in her duties because of the added responsibilities in overseeing the management of agency records and documents; and
- (5) the confidentiality of agency records is difficult to maintain because of the inadequate storage method presently being utilized.<sup>33</sup>

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<sup>33</sup>Determined from past subcontracting agencies non-compliance reports compiled by the Independent Monitoring Unit, Augusta, Georgia, 1978.

The purpose of the Comprehensive Employment and Training Program is to provide on the job training and employment opportunities for the economically disadvantaged, including both the unemployed and the underemployed.<sup>34</sup> This purpose implies that Supportive Services related to employment needs are to be rendered to those who are employed under the Comprehensive Employment and Training Program. As a result, managers and supervisors in the various subcontracting agencies that employ CETA workers must have some basic understanding of the nature of employee needs as well as the variety of organizational rewards and services which enable them to establish some type of motivational programs for their employees.

Management must therefore examine the employment situation in their agencies in order to determine what specific rewards can be made available to address the particular needs of the employees. Among the more common employee needs that may be met by organizational rewards, according to Edwin Flippo and Gary Musinger in their book Management, are the following:

- (1) Security of job. This particular need is high on the list of employees. It issues, from the basic need for general security and become most desired when threatened.

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<sup>34</sup>Federal Regulations 653.1 (Washington, D.C.: United States Press, 1978).

- (2) Pay. Inasmuch as pay enables one to satisfy physiological needs, it will always be an important employee want. It should also be pointed out that the pay cup has social handles (i.e., status and prestige).
- (3) Comfortable working conditions. The provisions of comfortable, safe and pleasant working conditions help to ease physiological needs associated with certain types and levels of the employee's physical environment.
- (4) Congenial Associates. The desire for congenial associates issues from the need to be accepted by the particular people with whom one must work.
- (5) Credit for work done. Receiving credit for one's accomplishments is a want, issuing from egoistic needs, and such recognition can be accorded by means of oral praise, letters or commendations, and merit ratings. And yet, gratification of egoistic needs may lead to a lessening of satisfaction of social needs because it tends to separate the individual from his or her associates who have not been so recognized. In these times, conflict within the individual is not an unusual occurrence.
- (6) Opportunity to advance. The desire for opportunity to advance to higher positions also issues from the egoistic needs. In the United States, two of the basic tenets of our culture have been freedom and opportunity. The employee prefers to see that avenues upward are open even though he or she may never attempt to embark upon the journey.
- (7) Competent and fair leadership. The desire for skillful and just leadership in an organization issues from a number of needs. The wish for just and equitable treatment comes in part from the security need. Competent leadership also inflicts less injury upon the subordinate's ego, it is less difficult to subordinate oneself to persons accorded higher status. And finally, competent leadership helps to assure the success of the enterprise, thus enabling the continuing gratification of other wants such as pay, job security, supportive services and the like; and

- (8) Appropriate job requirements. Many people want jobs that are interesting and that permit the use and development of their particular talents. Working for the pay check only and viewing it as the penalty for such pay are admittedly attitudes too often found in business firms. Such attitudes may result from poor design of jobs, faculty matching of individual abilities to job demands, or the conditioning of one's attitude by family and associates. Some complaints about demands can issue from lack of satisfaction of social or ego needs (i.e., the work layout that prohibits conversation.<sup>35</sup>

In order to determine whether employee needs are being met, the writer interviewed ten (10) CETA workers randomly selected from a group of twenty nine (29). There were several advantages in having such a sample group, and in having the questionnaire administered by the writer. First, by having such a small sample group, the writer attained a much higher response rate. Second, within the context of the questionnaire, the writer's presence significantly decreased the number of "do not know" answers. Also the writer provided a guard against confusing questionnaire items. If the respondents misunderstood the intent of a question, the writer clarified matters thereby obtaining much clearer responses.

The following three pages consist of the breakdown of questions administered to the employees and their responses.

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<sup>35</sup>Edwin B. Flipppo and Gary Musinger, Management, (Boston: Allyn and Bacon. Inc., 1978), p. 351.

From the analysis of the data compiled from the responses of the ten CETA participants interviewed, the writer discovered that of the eight employee needs that management must address, only two were being met, namely:

- (1) Working conditions. Nine of the ten participants expressed to the writer that they felt that the working conditions were quite pleasant and one of a safe and comfortable surrounding; and
- (2) Congenial Associates. All ten participants indicated to the writer that their fellow workers were somewhat understanding of each other's needs and that they were easy to get along with.

However, it is significant to underscore the fact that of the eight employee needs discussed by Flipppo and Musinger, six were not being met, namely:

- (1) Security of Job. Nine of the ten respondents indicated that they do not feel secure in their present positions. The respondents also revealed to the writer that they were aware that the CETA positions were temporary ones. Moreover, the respondents were aware of the fact that the CETA program could be modified or abolished at any time. This, according to the interviewees gave them a feeling of insecurity. The recent changes in the Comprehensive Employment and Training Program by the Reagan administration has confirmed this fact. However, it is the hope of the CETA participants that after the expiration of their employment in the Title VI CETA program, that the agency will employ them as permanent workers.
- (2) Pay/Wage. The CETA participants were asked if their economic status had improved in terms of pay/wages since being employed in the CETA program. Eight of the ten participants responded by saying that their economic situation had improved slightly. Additionally, the respondents said that although their economic conditions had improved somewhat, they maintained that the

minimum wages that the CETA program provided for work was just not enough to meet the rising and ever increasing cost of living. Above all, if they deduct the cost of transportation, food, etc. from their pay checks, it appears to them that there is no improvement at all.

- (3) Competent and fair leadership. Participants were asked whether supervisors were competent, fair and skillful in the execution of their duties, eight participants responded by answering no. The respondents maintained that their immediate supervisors were not skillful and tactful in carrying out their duties. The participants also revealed to the writer that their supervisors showed resentment to participants who possessed slightly better technical skills in certain areas than themselves.
- (4) Opportunity to Advance. All ten participants revealed to the writer that they were not aware of any promotional steps for advancement, nor had their supervisor ever discussed the matter with them. The respondents further expressed to the writer that they would prefer to know that avenues for advancement are open even if they decide not to pursue them. In fact, the appearance of being locked up in a dead-end job is what makes these CETA positions least attractive to most of the unemployed and the under-employed.
- (5) Appropriate Job Requirements. Eight of the ten respondents expressed to the writer that their job requirements and descriptions were not clearly stated. The respondents also felt that it was important for them to know and understand the direct job responsibilities, duties and requirements of their employment.
- (6) Credit for Work Done. The participants were asked whether recognition was given to employees for outstanding work performance or suggestions made to improve employment situations. All ten participants responded to this question negatively. Moreover, participants revealed to the writer that performance evaluations were not performed regularly. This according to the participants,



made them wonder what type of progress they were making in the CETA program, if any at all.<sup>36</sup>

The fact that only two of these eight essential needs are being met, does not augur well for employee motivation. Moreover, the absence of viable economic rewards which the classical theorists regard as imperative to employee motivation - accruing to the workers also compound the problem. In such an environment, the existence of skillful leadership and prospects for upward mobility in jobs could have improved the already hopeless conditions of these participants that are mainly unemployed people. However, the absence of these factors have seriously undermined the viability of these CETA programs too. The lack of job security and its attendant fear that one may find himself/herself left in the cold without any means of livelihood due to the very tentative nature of the CETA program, seriously discourages many of the unemployed from taking advantage of the program.

It is the opinion of this writer that if the CETA program were to be much more permanent in nature with prospects for advancement, it would be much more attractive to the many unemployed.

Finally, it is important to state that the existence of pleasant working conditions and congenial associates is not enough to guarantee worker satisfaction.

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<sup>36</sup>Interview with CETA participants, Augusta, Georgia, March 28, 1978.

## CONCLUSION

This paper has delineated several problems that existed in the implementation of the Title VI Public Service Employment Program for the Richmond County Comprehensive Employment and Training Agency that resulted in acts of noncompliance with Federal Regulations. The acts of noncompliance were subsumed under three categories:

- (1) inefficient system of communication between management sources;
- (2) inappropriate management of agency records; and
- (3) certain employee needs not being adequately met.

These identified acts of noncompliance, created several undesirable results:

- (1) A freeze on employment positions;
- (2) A loss of funds to subcontracting agencies;
- (3) An inefficient flow of pertinent information from subcontracting agencies to the prime sponsor;
- (4) Inadequate control of enrollment of participants at various work-sites; and
- (5) Delays in taking corrective action, when appropriate, after each monitoring activity.

It is also evident from the responses of the participants during the interviews, that there was no mechanism in place to address crucial employee needs. It is imperative that the CETA programs undertake a drastic overhaul if it is to remain viable and attract prospective participants.

## RECOMMENDATIONS

The ultimate goals of monitoring procedures is to develop problem-free programs in order that existing problems may be reduced or eliminated. The writer in his evaluation and analysis of the problems presented in the paper, proposes the following recommendations:

- (1) Subcontracting agencies should hold periodic meetings with all participants. The purpose of these meetings would be to:
  - (a) assess participant needs and services;
  - (b) discuss job descriptions and responsibilities;
  - (c) discuss grievance procedures; and
  - (d) explain Affirmative Action and E.E.O. activities.
- (2) The Prime Sponsor (Richmond County Comprehensive Employment and Training Agency) should hold periodic training seminars for supervisors with the subcontracting agencies. The purpose of these seminars would be to:
  - (a) get agencies feedback on programmatic aspects;
  - (b) explain the importance of accurate record keeping procedures;
  - (c) explain Affirmative Action and E.E.O. activities;
  - (d) explain complaint and grievance procedures;
  - (e) train agency supervisors in reviewing all systems for controlling program administration;
  - (f) explain in-house monitoring procedures, and
  - (g) explain all procedures concerning the fiscal aspects of granted programs.

- (3) The monitoring system should be implemented as a backup system for the collection of data from subcontracting agencies. Data collected through the monitoring system should be planned and executed in such manner that it encompasses a continual interaction with the existing management system. This procedure will aid the present formal structured communication system by relaying valuable data to proper sources in a more expeditious and proficient manner, by cutting the time of long distance telephone calls over a period of time, by acquiring more reliable data at the source, and by documenting on hand information for accuracy;
- (4) Subcontracting agencies programs work sites should be monitored on a more regular basis (monthly/bimonthly);
- (5) Subcontracting agencies should submit in writing to the prime sponsor corrective actions taken and recommendations proposed when problems are discovered through monitoring activities;
- (6) Grants of subcontracting agencies not complying with federal regulations should be reduced or suspended (depending on the severity of the act of noncompliance); and
- (7) A screening process should be implemented for participants with training in a particular trade so that employment positions would be more in line with their interests and skills.

If these listed recommendations are adopted and implemented, they will aid subcontracting agencies in operating a more efficient and productive program. In turn the Richmond County Comprehensive Employment Agency will additionally benefit by becoming more efficient in discharging its duties and responsibilities.

**APPENDIX A**  
**QUESTIONNAIRE**

## APPENDIX A

## Questionnaire

	Yes	No
Are your working conditions safe and comfortable?	9	1
Are your work associates congenial and friendly?	10	1
Do you feel that you have job security?	1	9
Have your economical status improved in terms of pay/wages since being employed under the CETA program?	2	8
Are your supervisors competent, fair and skillful in the execution of their duties?	2	8
Are avenues for advancement and upward mobility established and enforced?	0	10
Are your job descriptions and requirements clearly outlined?	2	8
Is reasonable recognition for outstanding work performance, new implementations or suggestions given?	0	10

APPENDIX B  
PUBLIC SERVICE EMPLOYMENT JOB DESCRIPTION





## DESCRIPTION IMU MONITOR

Page.2

7. Makes recommendations to the prime sponsor for corrective action whenever it identifies non-compliance with the ACT, CETP and Regulations.
8. Documents monitoring and reviews activities and any recommendations made for corrective action.
9. Conducts on-site monitoring visits utilizing samplings of sub-contractors slot levels to include monitoring of the following areas:
  - Affirmative Action Plans
  - Personnel Policies
  - Recruitment Process
  - Selection Process
10. Develops monitoring reports on each site visited.
11. Submits copies of reports to IMU Supervisor.
12. Reviews participants employability plan.
13. Reviews the eligibility verification process.
14. Reviews the prime sponsor's planning system.
15. Reviews the prime sponsor's system and sub-systems.
16. Conducts follow-up visits on recommendations as necessary.
17. Attends training seminars as scheduled.
18. Participates in other departmental goals as needed.
19. Provides technical assistance in IMU related matters.

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